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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

ADAM LYON,

USDC Case No. 6:20-cv-1883-JR

Plaintiff,

**MOTION FOR ENTRY OF DEFAULT
AGAINST DEFENDANT CARMEN
CONTRERAS**

v.

OREGON STATE HOSPITAL, a state agency; **OREGON DEPARTMENT OF HUMAN SERVICES**, a state agency; **OREGON HEALTH AUTHORITY**, a state agency; **PATRICK ALLEN**, director of Oregon Health Authority; **KRISTINE KAUTZ**, Deputy Director of Oregon Health Authority; **MIKE MORRIS**, Behavioral Health Director, Oregon State Hospital; **DELORES ‘DOLLY’ MATTEUCCI**, Superintendent, Oregon State Hospital; **DEREK WEHR**, Deputy Superintendent, Oregon State Hospital; **CARMEN CONTRERAS**, MHTT, Oregon State Hospital; **STEPHEN BISHOP**, MHTT-Security, Oregon State Hospital; **MICHAEL MURR**, RN, Nurse Manager, Oregon State Hospital; **BRYNN BROWN**, MHTT, Oregon State Hospital; **EUGENE DOE**, LPN, Oregon State Hospital; **JOHN AND JANE DOE(S)**, each sued in their individual and official capacities,

Defendants.

Plaintiff Adam Lyon, by and through undersigned counsel, respectfully requests that the clerk of the court enter default against defendant CARMEN CONTRERAS pursuant to Federal Rule of Civil Procedure 55(a). In support of this request, plaintiff relies on the record in this case and the declaration submitted herein.

DATED this 1st day of April, 2021.

Respectfully submitted,

/s/ Ginger G. Mooney
Ginger G. Mooney, OSB#: 031261
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I certify that I served a copy of plaintiff's **MOTION FOR ENTRY OF DEFAULT AGAINST DEFENDANT CARMEN CONTRERAS** on counsel for the defendants by eService at their last known email addresses:

Jessica Spooner
Oregon Department of Justice
1162 Court Street NE
Salem, OR 97301
jessica.spooner@doj.state.or.us

Katherine Beck
Oregon Department of Justice
1162 Court Street NE
Salem, OR 97301
kate.beck@doj.state.or.us

I further certify that I served a copy of this document on the *pro se* defendant at the following last known address, by placing a certified copy in a sealed envelope in the mail in Hood River, Ore.:

Carmen Contreras
625 18th Street NE
Salem, OR 97301

DATED this 1st day of April, 2021.

Respectfully submitted,

/s/ Ginger G. Mooney
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